REMARKS

This is a full and timely response to the outstanding final Office Action mailed July 1, 2005. Reconsideration and allowance of the application and pending claims are respectfully requested.

Claim Rejections - 35 U.S.C. § 102(e)

Claims 1, 4, 6, 8-10, 12-14, and 20-43 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Shima (U.S. Pat. No. 6,369,909). Applicant respectfully traverses this rejection.

It is axiomatic that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1554, 220 USPQ 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed invention must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(e).

In the present case, not every feature of the claimed invention is represented in the Shima reference. Applicant discusses the Shima reference and Applicant's claims in the following.

A. The Shima Disclosure

Shima discloses a print system. Shima, Patent Title. In one embodiment, the Shima system a high-function printer 2 (i.e., a network-compatible printer) receives a print command from a host computer 1. Shima, column 13, lines 18-22. The high-function printer interprets the command and recognizes the destination of the print command. Shima, column 13, lines 22-24. The high-function printer renders individual

primatives included in each page to be printed, thus preparing intermediate codes for each page. Shima, column 13, lines 22-30.

Flow from this point depends upon whether the high-function printer is or is not the destination. If so, the high-function printer prints the pages. Shima, column 13, lines 30-35. If not, the high-function printer incorporates the intermediate codes into the format of a print command of a low-function language, and transfers the command to a low-function printer 3 (i.e., a network-incompatible printer), which then prints the pages. Shima, column 13, lines 35-44. Operating in this manner, a network-incompatible printer can be used to print via a network-communicated print command.

B. Applicant's Claims

1. Claims 1, 4, 6, 8, 9, and 20-34

Applicant's independent claim 1 provides as follows:

> 1. A method for printing on a local printing device using a network-based printing service associated with the local printing device, the method comprising:
>
> obtaining a network address of the network-based printing service;
>
> designating the network-based printing service address as a default destination such that a user browser executing on a client device is redirected directly to the network-based printing service when a print command is received;
>
> receiving a print command provided to an imaging service with the user browser;
>
> automatically redirecting the user browser to the network-based printing service;

accessing image data from a personal imaging repository with the network-based printing service; and

initiating a print job on the local printing device with the network-based printing service.

In the Office Action, it is argued that Shima teaches each and every limitation of claim 1. Applicant disagrees and discusses each limitation of claim 1 in the following.

First, Shima does not teach "obtaining a network address of the network-based printing service". In the Office Action, it is argued that column 21, line 61 to column 22, line 28 provides this teaching. That portion of the Shima disclosure provides as follows:

> FIG. 9 shows the foregoing processing. *The print command data having a destination IP address of "163.141.22.51" are transmitted to a processing routine within the network printer 11.* In contrast, the print command data having a destination IP address of "163.141.22.52" or the print command data having a destination address of "163.141.22.53" are transferred to, e.g., the USB 26 and the network layer 29 and 34 of the serial interface, from the network layer 20 of TCP/IP, and are transferred to the network-incompatible printers 26, 24. In this way, when the destination of print command data is determined by the network layer 20 of TCP/IP, the network-incompatible printers 26, 24 which are the destinations of the print command data are required to interpret the TCP/IP application layer protocols (LPR, HTTP, or FTP).
>
> First, example (3) will be described. Print command data are transmitted twice to the network printer 11 by issue of two different transmission instructions from the host 15.
>
> First time: lpr-S 163.141.22.51 print.dat
>
> Second time: ftp163.141.22.51 print.dat

> The first transmission instruction is addressed to a protocol "LPR" and signifies transmission of data to an IP address of "163.141.22.51," and the second transmission instruction is addressed to a protocol "FTP" and signifies transmission of data to the identical IP address. The packet transmitted first is given a port number "515" assigned to LPR, and the packet transmitted second is given a port number "21" assigned to FTP. Provided that a port number "515" is assigned to the LPR application of the network printer 11, and that a port number "21" is assigned to another printer, the data transmitted first are printed by means of the network printer 11, but the data transmitted second are transferred to another printer.
> [Shima, column 21, line 61 to column 22, line 28 (emphasis added)]

As is apparent from the above excerpt, Shima's system does not "obtain" a network address of a network-based printing service. To the contrary, the network address is *already known*. If this were not so, the "IP address" could not be "transmitted" to the printer 11. Shima fails to anticipate claim 1 for at least this reason.

Second, Shima does not teach designating a network-based printing service address as a default destination "such that a user browser executing on a client device is redirected directly to the network-based printing service when a print command is received". In the Office Action it is argued that Shima discloses this aspect of claim 1 in column 22, lines 29-65. That portion of the Shima disclosure provides as follows:

> FIG. 10 shows the foregoing operations. The print command data assigned a destination port number "515" are transmitted to a processing routine within the network printer 11. In contrast, the print command data assigned a destination port number "21" or "81" are transferred to, e.g., the USB 26 and the transport layers 30, 35 of the serial interface, from the transport layer 21 of TCP/IP, and are transferred to the network-incompatible printers 26, 24. Even in this

case where the destination of print command data is determined by the transport layer of TCP/IP, the network-incompatible printers 26, 24 to which the print command data are transferred are required to interpret a TCP/IP application layer protocol (LPR, HTTP, or FTP).

Nest, example (4) will be described. In this case, print command data are transmitted twice to the network printer 11 by issue of two different transmission instructions from the host 15.

First time: lpr-S 163.141.22.51 -P PRINTER1 print.dat

Second time: lpr-S163.141.22.51 -P PRINTER2 print.dat

Both the command data transmitted first and the command data transmitted second are addressed to an identical IP address of a protocol "LPR." However, these print command data specify different data queues "PRINTER1" and "PRINTER2" within the application. The LPR protocol enables management of a plurality of print queues inside the protocol and enables holding of print requests in individual print queues. The designation of the print queues "PRINTER1" and "PRINTER2" are incorporated into the packet as identifiers regarding an application layer. At this time, if the identifier "PRINTER1" is assigned to the network printer 11 and the identifier "PRINTER2" is assigned to another printer, the data transmitted first are printed by means of the network printer 11, but the data transmitted second are transferred to another printer.

FIG. 11 shows the foregoing operations. The print command data having a destination print queue "PRINTER1" are transmitted to a processing routine within the network printer 11.

[Shima, column 22, lines 29-66]

As can be appreciated from this excerpt, Shima says nothing about designating a network-based printing service address as a "default destination" so that a "user browser executing on a client device is redirected directly to the network-based printing service when a print command is received". Indeed, Shima fails to even

identify use of a "browser" or any "redirection" of any such browser. Instead, the cited excerpt merely describes routing of print command data.

Third, Shima does not teach receiving a print command "provided to an imaging service with the user browser". Again, column 22, lines 29-65 say nothing about a browser at all. In fact, the Shima reference does not even contain the word "browser" at all!

Fourth, Shima does not teach "automatically redirecting the user browser to the network-based printing service". In the Office Action, it is argued that column 33, lines 13-65 teach this aspect of claim 1. That portion of the Shima disclosure provides as follows:

> In a case where the processing proceeds to step 2312, the document analyzer 121 transfers to the renderer 123B an image file, e.g., an image file of a certain picture (e.g., a frame picture), in place of the image of the resource. A print image of the image file is also prepared. In contrast, in a case where the processing proceeds to step 2310, the document analyzer 121 transmits the resource of file format C to the device selected from the device table, by way of the network 170, and requests the device to render the resource and to send back a result of such rendering. For example, in a case where the file format C is GIF, the GIF resource is sent to the printer 102 compatible with GIF. For example, the printer 102 has a configuration analogous to that shown in FIG. 22. The GIF resource requested by the printer 81 is rendered by means of a corresponding renderer, and a print image resulting from a rendering operation is sent back to the printer 81 by way of the network 170. In step 2311, the document analyzer 121 of the printer 81 receives the print image from the printer 102 and dearchives the print image into memory on a band basis.

After all the resources included in the composite document have been rendered for each band of the document, the processing proceeds to step 2306. The image composer 125 integrates the print images of the respective resources, thus dearchiving complete print data of each band on memory. Subsequently, in step 2307, the print engine 93 acquires the complete print image and prints the thus-acquired print image on paper.

FIG. 26 is a flowchart showing procedures required to register the device table shown in FIG. 25 into the internal memory of the printer 81. The registration operation can be performed when the user orders the printer to perform, periodically, at the time of starting up of the printer, or at a suitable opportunity, whenever necessary.

First, in step 2501, the document analyzer 121 of the printer 81 draws up a list of addresses of all the devices 101, 102, 103, and 104 provided within the domain by inquiring, e.g., a router having an identical routing table. In step 2502, the document analyzer 121 inquires of each of the thus-listed devices a file format which can be rendered by the device. If there is an answer to the inquiry from the device within a certain period of time, the document analyzer 121 proceeds to step 2504. The document analyzer 121 receives from the device a notification of the file format which can be rendered by the device. In step 2505, the file format is registered in the device table in such away as to correspond to the address of the device. An inquiry and registration are performed with regard to all the devices provided in the domain. As a result, a device table such as that shown in FIG. 25 is completed.

According to the seventh embodiment, the printer 81 can receive and print a composite document including a plurality of file formats, by utilization of a renderer provided therein or a renderer of another device.

[Shima, column 33, lines 13-65]

As can be appreciated from this excerpt, Shima says nothing about "redirecting [a] user browser". In fact, as is identified above, Shima does not say anything in the Shima disclosure. Instead, the above excerpt merely discusses routing of image files.

Fifth, Shima does not teach "accessing image data from a personal imaging repository with the network-based printing service". This is particularly true of column 33, lines 13-65, which has been reproduced above. As is described above, the Shima system routes print command data, i.e., print jobs. Nothing in the Shima disclosure addresses accessing any image data from a "repository" using a "network-based printing service". Specifically, since the image data is directly provided to the "printing service" (e.g., network printer 11), there is no need to "access" such data from a "personal imaging repository".

In view of the foregoing, Shima clearly does not anticipate claim 1. Shima therefore does not anticipate claims 4, 6, 8, 9, or 20-34, which depend from claim 1.

Applicant notes that the claims that depend from claim 1 contain additional limitations that are not taught by Shima. For example, regarding claim 4, Shima does not teach "updating a record of a current default destination with an imaging extension".

Regarding claim 6, Shima does not teach "instructing a personal imaging repository that stores image data available for printing to designate the network-based printing service address as the default destination".

Regarding claim 8, Shima does not teach "first detecting a direct connection between a client device and the local printing device".

Regarding claim 9, Shima does not teach "removing the designation of the network-based printing service address as a default destination when a connection between the client device and the local printing device is severed".

Regarding claim 22, Shima does not teach "obtaining the network address from an imaging extension".

Regarding claims 23, 28, and 33, Shima does not teach an "imaging extension" that "comprises part of the user browser".

Regarding claims 24 and 29, Shima does not teach an "imaging extension" that "executes on a remote network server".

Regarding claim 25, Shima does not teach an "imaging extension" that "obtains the network address by querying the local printing device".

Regarding claim 26, Shima does not teach "obtaining the network address from a direct connection manager that executes on the client device".

Regarding claim 27, Shima does not teach a "direct connection manager" that "obtains the network address by querying the local printing device".

Regarding claim 30, Shima does not teach "accessing the image data using an imaging extension".

Regarding claim 31, Shima does not teach "downloading generic access instructions from the network-based printing service to the imaging extension to call on the imaging extension to access the personal imaging repository".

Regarding claims 32 and 34, Shima does not teach an "imaging extension" that "comprises at least one application programming interface (API)".

2. Claims 10, 12-14, and 35-43

Applicant's independent claim 10 provides as follows:

> 10. A system for printing on a local printing device using a network-based printing service associated with the local printing device, the system comprising:
>
> means for obtaining a network address of the network-based printing service; and
>
> means for designating the network-based printing service address as a default destination such that a user browser executing on a client device is redirected directly to the network-based printing service when a print command is received;
>
> means for automatically redirecting the user browser to the network-based printing service when a print command is received by an imaging service via the user browser;
>
> means for accessing image data from a personal imaging repository with the network-based printing service; and
>
> means for initiating a print job on the local printing device with the network-based printing service.

Regarding claim 10, Shima fails to teach each limitation of the claim. Applicant refers the Examiner back to the discussion of the limitations of claim 1 described above.

Regarding claim 12, Applicant refers back to the discussion of claim 4.

Regarding claim 13, Applicant refers back to the discussion of claim 6.

Regarding claim 14, Applicant refers back to the discussion of claim 8.

Regarding claim 35, Applicant refers back to the discussion of claim 22.

Regarding claim 36, Applicant refers back to the discussion of claim 23.

Regarding claim 37, Applicant refers back to the discussion of claim 25.

Regarding claim 38, Applicant refers back to the discussion of claim 23.

Regarding claim 39, Applicant refers back to the discussion of claim 26.

Regarding claim 40, Applicant refers back to the discussion of claim 27.

Regarding claim 41, Applicant refers back to the discussion of claim 31.

Regarding claim 42, Applicant refers back to the discussion of claim 32.

Regarding claim 43, Applicant refers back to the discussion of claim 9.

II. Claim Rejections - 35 U.S.C. § 103(a)

Claims 2-3 and 11 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Shima. Applicant respectfully traverses this rejection.

As is identified above in reference to independent claims 1 and 10, Shima does not teach the limitations of claims 1 and 10. Applicant respectfully submits that claims 2-3 and 11, which depend from claims 1 and 10, are allowable over the Shima for at least the same reasons that claims 1 and 10 are allowable over Shima.

CONCLUSION

Applicant respectfully submits that Applicant's pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

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